



Ministry
of Defence

Element 1: Leadership, Governance and Culture



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Amendment record

1. This chapter has been reviewed by the Directorate of Levelling Up, Climate Change and Sustainability together with relevant subject matter experts and key environmental stakeholders. Any suggestions for amendments should be sent to:

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Version No	Date	Text Affected	Authority

Use of must and should

2. Where this chapter says must, this means that the action is a compulsory requirement.

3. Where this chapter says should, this means that the action is not a compulsory requirement but is considered best practice to comply with the policy.

Scope

4 This policy applies to all those employed by Defence (military or civilian) as well as those working on behalf of Defence (for example, contractors). It applies to all Defence activities carried out in any location (UK or overseas).

Introduction

5. This Element provides the direction that must be followed and the guidance and good practice that should be followed and will assist users to comply with the expectations for promoting leadership, governance and culture for an effective approach to Environmental Management (EM) that are set out in Element 1 of Volume 1 to JSP 816 (this JSP).

Purpose and expectations

6. This element focuses on the extent that the Defence Organisation is forward-thinking and has clear aims and objectives about what it wants to achieve. Together with effective leadership, governance methods promote a consistent approach to environmental management at all levels and support a positive, proactive culture of reporting and learning. This is reinforced by establishing accountability based on well-defined authority levels and a clear understanding of responsibilities.

E1.1 Leadership sets the ‘tone from the top’ and actively demonstrates their commitment to environmental management.

E1.2 Leadership promotes a culture of continual improvement, championing the environment, and embedding transparent and open reporting.

E1.3 Leadership sets clear environmental management responsibilities through which the organisation is measured and held to account.

E1.4 Leadership is visible at all levels of the Defence Organisation; including through direct interactions with the wider workforce and other stakeholders on matters of environmental management.

E1.5 Corporate governance ensures that the environmental aims and objectives of the organisations are compatible with Defence strategic direction.

E1.6 A culture is in place that encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognises them for it.

Strategic intent and vision for environmental policy for Defence

7. Defence faces a challenge: the need to protect and enhance our environment, adapt and be resilient in the changing climate whilst preserving military capability. It is critical that Defence continues to explore and understand how its activities influence and contribute to the changing environment, and better understand how a changing environment impacts Defence.

8. An environmental policy defines the strategic direction of an organisation with respect to the environment. The environmental policy provides a framework for establishing environmental objectives and sets the level of responsibility and performance required, against which subsequent actions can be measured. Policy, legislation and regulations are covered in more depth in Element 3 of this JSP.

Aims and objectives

9. Aims and objectives can be strategic, operational or tactical. When establishing, reviewing and applying actions to achieve environmental objectives, a systematic basis for

the organisation should be developed to improve environmental performance in some areas, while maintaining its level of environmental performance in others.

10. Outlining clear aims and objectives ensures that all stakeholders are aligned and effectively implementing their environmental management plans. Environmental objectives must be part of the organisation's overall management objectives as this enhances both the value of the Environmental Management Systems (EMS) and Defence's environmental commitments.

11. Environmental objectives should be established at the organisation's highest level as well as at other levels where activities that are important to achieving the environmental policy commitments and overall organisational goals are carried out. They should also be consistent with the environmental policy and commitments to the protection of the environment, including promoting biodiversity, creating green spaces, preventing climate change, preventing pollution and reducing GHG emissions, fulfilment of compliance obligations, and continual improvement.

12. Environmental objectives should have a clear thread drawn from Defence strategic planning and performance framework. Objectives must have support and enable the delivery of Defence enabling objectives. This link should be documented clearly through EMS` and related documents.

13. When establishing environmental objectives, an organisation should consider inputs, including:

- a. principles and commitments in its environmental policy.
- b. its significant environmental aspects (and information developed in determining them).
- c. its compliance obligations.
- d. risks and opportunities that need to be addressed, related to other issues and requirements affecting the environmental management system.
- e. effects of achieving environmental objectives on activities.
- f. other organisational goals.

14. When setting environmental objectives, it is important to determine whether they are:

- a. expressed directly as a specific performance level or in a general manner and further defined by one or more targets (which have specific timeframes).
- b. applicable across the organisation or more narrowly to site specific or individual activities.
- c. contributed to at different levels and functions of the Defence organisation, or by others in the value chain or across the Department; if so those individuals must be aware of their responsibilities.
- d. clearly documented and communicated.
- e. able to be tracked and progress monitored.

15. When planning actions to achieve environmental objectives, the relevant programmes should address roles, responsibilities, processes, resources, timeframes, priorities and the actions necessary for achieving the objectives. These programmes should be dynamic and when changes occur, they should be revised as necessary.

Authorities and legislation

16. The environment is an area of devolved power in the UK and the Devolved Administrations therefore have the right to bring forward their own environmental protection legislation. Within the UK there are four differing regulatory regimes for environmental protection; the differences can be subtle, but the impact of non-compliance may be significant.

17. Defence operates throughout the UK and needs to be aware of the differing requirements in each of the four UK territories to achieve compliance in meeting differing statutory requirements. When overseas, Defence should apply the most stringent measures where reasonably practicable and understand their host nations' relevant environmental requirements. Further guidance is provided in Element 3 of this JSP.

18. Except in specified cases where Defence has a Derogation, Exemption or Disapplication (DED), its activities in the UK are subject to the requirements of environmental protection legislation and thus regulation by Statutory Regulators. Within the UK territories the Statutory Regulators and advisory organisations with primary duties to protect the environment include:

- a. England – the Environment Agency (EA), Natural England (NE), Marine Management Organisation (MMO), Historic England (HE), Marine Coastguard Agency (MCA) and Local Authorities (LAs).
- b. Scotland – Scottish Environment Protection Agency (SEPA), NatureScot (NS), Marine Scotland and LAs.
- c. Wales – Natural Resources Wales (NRW), Cadw, Welsh Government Office and LAs.
- d. Northern Ireland – Northern Ireland Environment Agency (NIEA).

Leadership, governance and culture

Leadership

19. The Secretary of State's (SofS) Policy Statement for Health, Safety and Environmental Protection (HS&EP) applies to everyone within Defence, including contractors and partner organisations. The Policy Statement is a commitment of the SofS's personal leadership in HS&EP and as such the SofS relies on all those in leadership roles to make sure the policy is applied.

20. The policy establishes the structure for Defence to conduct environment management. Organisation leadership should show their personal and collective commitment to this area and ensure the SofS policy is applied.

21. Senior leaders of Defence organisations should lead on HS&EP through the responsibilities set out in their letters of delegation issued by the Permanent Secretary (or equivalent delegated authority). They are to make sure that their Defence activities are

delivered in line with the Defence Environmental Management System (DEMS) and their own EMS. The DEMS amplifies the SofS Policy Statement and describes the environmental guidance and principles to be followed by Defence organisations.

22. Leadership should demonstrate a commitment to managing the environment within their organisation by setting a clear tone from the top, promoting the Defence vision for EM by:

- a. taking overall responsibility and accountability for the prevention of Defence related environmental degradation.
- b. maintaining, continually monitoring and improving policies and procedures, and ensure there is an effective system in place to stay informed about changing policies.
- c. making sure that they are visible across their organisation by prioritising environmental objectives alongside other strategic objectives.
- d. communicating the importance of effective EM and of conforming to the EMS requirements using a range of communication methods.
- e. regularly review environmental performance at leadership meetings.
- f. developing, leading and promoting a culture in the organisation which supports the intended outcomes of the EMS.
- g. ensuring the organisation establishes and implements processes for continuous engagement via consultation and participation of the workforce and other stakeholders.
- h. encouraging the workforce and stakeholders to identify areas for improvement, leading to continual improvement in EM through collaboration and innovation.
- i. promoting open and transparent reporting, environmental actions and behaviours, i.e. culture changes that need to be made to improve and embed environmental protection.
- j. communicating effectively lessons identified in one area, across all areas.
- k. driving continual improvement of environmental performance management.
- l. effective oversight of action plans.

23. Practical examples of leadership environmental commitment can include:

- a. environmental 'advocacy' by leaders; taking clear and informed positions on environmental issues inside and outside the organisation (e.g. within organisation management meetings).
- b. direct and visible involvement in the identification and mitigation of environmental risks and the investigation of environmental incidents.
- c. routine participation in site inspections and audits which address environmental issues.

- d. the active and tangible encouragement of the workforce to participate in environmental improvement at work and at home.

24. The leadership and commitment of senior management are critical to the integration of the EMS into the business process. Integration is an ongoing process, and benefits can increase over time with continual improvement. This can enhance the organisation's ability to operate more effectively and efficiently, through sharing of processes and resources and to deliver increased value by being more closely associated with those processes that the organisation depends upon to operate.

25. Opportunities for the Defence Organisation to integrate EM activities into its business process include the incorporation of:

- a. intended environmental outcomes or objectives of the environmental management system in the organisation's vision or strategy.
- b. environmental policy commitments into the governance of the organisation.
- c. environmental management system responsibilities within job descriptions.
- d. environmental performance indicators within the organisation's business performance systems, e.g. appraisals, KPIs.
- e. environmental performance in external (non-MOD) reporting, e.g. sustainability reports.
- f. processes for determining significant environmental aspects and other risks and opportunities affecting the EMS into its standard business risk management process(es).
- g. environmental criteria in business process planning, product or service design, and procurement processes.
- h. environmental communication into business communication, engagement channels and processes, e.g. public relations.

26. These activities will require a holistic and cross-Department approach, whereby Defence organisations and TLBs should seek to actively collaborate and communicate with others.

Governance

27. Defence organisations establish their own governance arrangements and framework. The Defence organisation's governance arrangements should include a hierarchy and structure of EM forums with agreed terms of reference, a timetable of scheduled meetings. These governance arrangements should be coherent with Defence wide governance and have a formal communication route that is understood by the organisation.

28. Environmental governance within Defence organisations should provide leadership oversight, challenge and review of environmental policies, procedures, performance and effectiveness of the organisation's EMS.

Culture

29. Culture can be best understood as the ideas, customs and behaviours of an organisation and the teams within it. [Environmental culture](#) can be defined, as “the total of learned behaviour, attitudes, practices and knowledge that a society has with respect to maintaining or protecting its natural resources, the ecosystem and all other external conditions affecting human life”.

30. The strategic direction of the Defence Organisation can influence how individuals within Defence behave in relation to the environment and defines the culture of the organisation.

31. Building a strong culture of environmental responsibility goes beyond morally doing the right thing; it is vital to managing and minimising environmental risks and impacts, and has indisputable reputational benefits for Defence. Defence should support open and honest reporting and set a culture where everyone feels able to speak up, rather than fearing blame. They should develop and maintain policies and processes that develop and promote a positive environmental culture throughout their organisation and area of responsibility, they should share and effectively communicate good practice and any environmental lessons identified in order to promote and support continual improvement.

32. A positive environmental culture within an organisation is dependent on the following:

a. **Leadership commitment.** To motivate others and show a concern for environmental practice in line with strategic direction. It is indicated by the proportion of resources (time, money, people) and support allocated to EM and by the status given versus delivery/output, cost etc. The active involvement of senior management in the EM system is vital.

b. **Visible management.** All leaders are role models and everyone needs to be seen to lead by example when it comes to environmental practices. Leaders should be available to openly talk about environmental issues, protection and sustainability, and facilitate open discussion to share challenges and opportunities. It is important that these leaders are seen as committed to EM through both their words and their actions.

c. **Strong communications between all levels of personnel.** In a positive culture, questions about EM should be part of everyday work conversations, and challenge encouraged. People should not only ask but, listen actively to what they are being told by others, and act on this. Active personnel participation in EM is important, to build ownership of all levels and exploit the unique knowledge that personnel have their own work. In organisations with a good environmental culture, personnel and leaders will be consistent, and EM is seen as a joint exercise to help change things for the better.

d. **Effective decision making.** EM needs to be fully embedded within all aspects of an organisation’s evidence-based decision-making processes.

33. Practical examples of a positive environmental culture can include:

a. demonstrable evidence of the reduction of quantifiable environmental impacts, e.g. waste and energy use reduction.

- b. the adoption of more sustainable transport solutions by operations and within the workforce e.g. cycling to work, car-pooling and the installation of electric vehicle charging stations.
- c. educating the workforce and supply chain about environmental issues and how they can take action to reduce their environmental impact e.g. providing training on sustainability, sharing information on environmental initiatives and encouraging feedback and ideas.
- d. Active collaboration within and outside the organisation to understand and promote sustainability and protect the environment e.g. forming supply chain partnerships and working with community organisations.

Roles and responsibilities

34. Examples of environmental protection roles include:

Role	Responsibility
Defence Safety Authority (DSA)	Responsible for the regulation of Defence Health, Safety and Environmental Protection. Defence Environmental Protection Regulator is responsible for third-party assurance, regulation and enforcement of environmental protection across Defence.
Chief Environment and Safety Officer (CESO)	Provides policy, advice and guidance in respect of environmental protection which includes monitoring and measuring the level of EMS implementation and undertaking annual reviews of this.
Heads of Capability	Decisions made by Heads of Capability are vital to setting good contractual requirements and managing environmental impact. They are responsible for ensuring that environmental concerns are taken into consideration during the decision-making process.
TLB Holders	TLB Holders are to conduct Defence activities in their area of responsibility safely, environmentally responsibly and compliant with legislation. Duties are delegated to those with direct responsibility for managing Defence activities.
Environmental Protection Officer (EPO/SHEF)	Responsible for creating and maintaining the site EMS by seeking out and confirming appropriate focal points for all stakeholders that operate on their site. They must also conduct a review of the site EMS on an annual basis.
Operating Centres	Liaise with delivery teams to ensure that information needed for Project Oriented Environmental Management Systems (POEMS) is in place and communicate with front line commands to ensure it is being implemented correctly.
Head of Establishment (HoE)	Responsible for the effective implementation of their site's EMS. They are to assign a representative with sufficient authority, awareness, competence and resources to ensure successful establishment, implementation and maintenance of the EMS.
Employees	Under environmental protection legislation, employees have duties and should be made aware of those through site producers and systems.

Element summary

35. Defence Organisation senior leadership should:

- a. set the 'tone from the top' and actively demonstrate their commitment to EM.
- b. promote a culture of continual improvement, championing the environment and embedding transparent and open reporting.
- c. set clear EM responsibilities by which the organisation is measured and held to account.
- d. be visible at all levels of the organisation; including through direct interactions with the wider workforce and supply chain on matters of EM.
- e. support the alignment of environmental aims and objectives with Defence's strategic direction.
- f. contribute to a culture which encourages positive environmental behaviours at all levels, empowers individuals to demonstrate these behaviours and recognise them for it.

Plan- Do- Check- Act- (PDCA) Cycle

36. This diagram is designed to illustrate where this, and all the Elements of JSP 816, fit into the PDCA cycle.

